

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

MARK ANTHONY JACKSON,

Plaintiff,

-vs-

Case No. 3:20-cv-13234-RHC-APP
Honorable Robert H. Cleland
Magistrate Judge Anthony P. Patti

CITY OF RIVER ROUGE, a municipal corporation,
ADAM ALDERMAN, CRAIG WAPLE,
DANNY DOTSON and AMJAD ISSA, individually,

Defendants.

Kenneth D. Finegood (P36170)
Attorney for Plaintiff
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Timothy S. Ferrand (P39583)
Cummings, McClorey, Davis & Acho, P.L.C.
Attorney for Defendants
City of River Rouge, Adam Alderman, Craig
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Michael D. Crow (P51538)
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Attorney for Defendant Amjad Issa
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STIPULATED PROTECTIVE ORDER PURSUANT TO FRCP 26(c)(1)

This matter having come before this Honorable Court pursuant to the stipulation of the parties; and the Court being otherwise fully advised in the

premises;

IT IS HEREBY ORDERED that any and all materials and information (however described), including, but not limited to, all personnel files, policies, procedures and/or orders, requested in any and all of Plaintiff's discovery requests, will be produced subject to the following conditions:

1. The above-described materials and information will be used solely for purposes of this lawsuit and not for any other purpose and in compliance with the applicable Federal Rules of Civil Procedure, including, but not limited to, FRCP 26(c)(1) and the Federal Rules of Evidence.

2. This Order shall survive the final termination of this action. Upon termination of this case, counsel for Plaintiff shall assemble and return all materials and information and all copies of same, or shall certify the destruction thereof. The Court shall retain jurisdiction to entertain such further proceedings and to enter further orders and judgments as may be necessary or appropriate to implement and/or enforce the provisions of this Order.

3. Plaintiff agrees to return all materials and information produced by Defendants that are the subject to the Protective Order or certify the destruction thereof, within fourteen (14) days of entry of the Order of Dismissal of this lawsuit.

4. Any and all materials and information produced in this regard may not

be duplicated, forwarded, shared, published and/or disclosed in any manner or form with any other person and/or entity for any reason, without the consent of Defendants, other than for purposes of this lawsuit.

5. This Order does not authorize the filing of any documents under seal. Documents may be sealed only if authorized by statute, rule, or order of the Court. A party seeking to file under seal any paper or other matter in any civil case pursuant to this section shall file and serve a motion that sets forth (i) the authority for sealing; (ii) an identification and description of each item proposed for sealing; (iii) the reason that sealing each item is necessary; (iv) the reason that a means other than sealing is not available or unsatisfactory to preserve the interest advanced by the movant in support of the seal; (v) a memorandum of legal authority supporting the seal.

6. Plaintiff shall require anyone given access to the materials or their contents to fully abide by the requirements of this Agreement.

S/Robert H. Cleland

ROBERT H. CLELAND

UNITED STATES DISTRICT JUDGE

Dated: December 9, 2021

I hereby certify that a copy of the foregoing document was mailed to counsel of record and/or pro se parties on this date, December 9, 2021, by electronic and/or ordinary mail.

S/Lisa Wagner

Case Manager and Deputy Clerk

(810-) 984-2056

We agree to entry of the above Order:

/s/Kenneth D. Finegood w/consent

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/s/Timothy S. Ferrand w/consent

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/s/Michael D. Crow_____

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